REMARKS

Claims 1-19 and 21-36 are presently pending in this application. Claims 14-16 have been amended.

In the January 29, 2007 Office Action, claims 1-19 and 21-36 were rejected. More specifically, the status of the application in light of this Office Action is as follows:

(A)   Claims 14-16 were rejected under 35 U.S.C. § 112, second paragraph;

(B)   Claims 14-16 were rejected under 35 U.S.C. § 101;

(C)   Claims 1-3, 7-8, 10, 12, 17-18, 22-24, 28-29, 31-34, and 36 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication No. 2002/0116240 to Hsuan ("Hsuan");

(D)   Claims 9, 19, and 30 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Hsuan; and

(E)   Claims 4-6, 13-16, 21, 25-27, and 35 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Hsuan in view of U.S. Patent No. 6,463,345 to Peachey-Kountz et al. ("Peachey-Kountz").

A.   Response to the Section 112 Rejection

Claims 14-16 were rejected under 35 U.S.C. § 112, second paragraph. The Examiner indicated that the preamble of the claims is drawn to a system, while the body of the claim is written as method steps. Without conceding the propriety of the rejection, Applicant has amended the claims to address the Examiner's concerns.

B.   Response to the Section 101 Rejection

Claims 14-16 were rejected under 35 U.S.C. § 101 for reasons similar to the § 112 rejection. Without conceding the propriety of the rejection, Applicant has amended the claims to address the Examiner's concerns.

C.   Response to the Prior Art Rejections over Hsuan

Claims 1-19 and 21-36 stand rejected over Hsuan, alone or in combination with Peachey-Kountz. Applicant respectfully traverses these rejections.

Applicant's techniques are directed to tracking orders at a unit level. One aspect of Applicant's techniques provides a unit order system that interfaces with an existing order processing system to track orders at the unit level. The existing order processing system provides an order database that typically includes an order record for each order and an item record for each item of the order. Applicant's unit order system provides a unit order database that includes a record for each unit of each item of each order in the order database. The unit order system periodically accesses the existing order processing system's order database to identify new orders or changes to existing orders in order to update the unit order database to reflect the new, changed, or canceled orders.

Hsuan describes a network server for servicing articles of wear (e.g., clothing), such as those that require a certain degree of cleanness. Each article is tracked by a unique article identifier. The unique article identifier may ensure, for example, that the proper servicing process is used for the article. The server is comprised of several databases, including a customer database, an article database, an order database, and a last-serviced database. Hsuan's article database catalogs articles according to their unique article identifiers and associates articles with customer identifiers. Hsuan's order database tracks the process status of articles according to their unique article identifiers.

Applicant's claims are directed to "tracking orders for multiple units of items" (emphasis added). Each order has one or more items, and each item has an associated quantity of units. Claims 1-10 recite:

A method in a computer system for tracking orders for multiple units of items, each order having one or more items, each item having an associated quantity of units of that item.

Claims 11-19 and 21 recite:

A computer system for tracking orders for <u>multiple units</u> of items, each order having one or more items, each item having an associated quantity of units of that item.

Claims 22-31 recite:

A computer-readable medium containing instructions for controlling a computer system to track orders for <u>multiple units</u> of items, each order having one or more items, each item having an associated quantity of units of that item, the orders being stored in an existing order database that is updated to reflect current orders.

Claims 32-35 recite:

A method in a computer system for tracking orders for <u>multiple units</u> of items at an individual level when an existing order entry system supports tracking only at the order or item level.

Claim 36 recites:

A method in a computer system for augmenting a conventional order processing system capable of tracking orders for units of items at the order level to allow the order processing system to track orders at a unit level.

Unlike Applicant's techniques, Hsuan does not describe "tracking orders for multiple units of items." The Examiner apparently believes that Hsuan's order database corresponds to Applicant's order database. However, each entry in Hsuan's order database contains only <u>one</u> unit. Hsuan describes, "Each entry 91 [in the order database] is for a laundry service order for <u>a particular article</u> of wear 300." (Hsuan, ¶ [0037] (emphasis added).) Each of Hsuan's "articles" is a single article that has a unique article identifier associated with it. (*See, e.g.,* Hsuan ¶ [0038].) Because each entry in Hsuan's order database contains only one unit, Hsuan has no need to create a unit order database that allows tracking of orders at a unit level. Hsuan fails to describe a problem to which Applicant's techniques are directed: an existing order database that does not support tracking of orders at a unit level.

Further, unlike Applicant's techniques, Hsuan offers no teaching or suggestion that an order may be placed for more than one unit of an item (e.g., article of clothing). Hsuan's Figure 8 illustrates an order form that may be generated by the system. The form apparently only allows a customer to request servicing on <u>one</u> unit of each item. Hsuan describes, "The customer may also use the boxes 357 to fill in <u>the</u> article identification 310 of <u>the</u> article 300 for which the service is requested." (Hsuan, ¶ [0035] (emphasis added).) For example, the form apparently only allows the customer to request servicing of one hood according to Class A cleaning, such as by entering one article identifier in box 357.

The claims also recite "creating a unit order database using information from the existing order database." Claims 1-10 and 22-31 recite:

creating a unit order database using information from the existing order database to include a record for each unit of each item of each order of the existing order database.

Claims 11-19 and 21 recite:

means for creating a unit order database using information from an existing order database to include a record for each unit of each item of each order of the existing order database.

Claims 32-35 recite:

creating a unit order database using information from the existing order database to reflect the identified changes to the orders of the existing order database.

Claim 36 recites:

augmenting the conventional order processing system with a unit order database separate from the order database, the unit order database created using information from the existing order database.

The Examiner apparently believes that Hsuan's order database corresponds to Applicant's order database and that Hsuan's article database corresponds to Applicant's unit order database. However, Hsuan's article database is not created "using information from [Hsuan's] order database." While each of Hsuan's databases may contain one or more of the same items of information, such as article ID (*see, e.g.,* Figs. 10 and 11), each of the databases is apparently created independently of each other database. Unlike Applicant's techniques, Hsuan offers no teaching or suggestion that its article database is created <u>from</u> its order database.

Claims 1-19 and 21-35 also recite "each record in the unit order database having a reference to the record of the corresponding order in the existing order database." Claims 1-19 recite:

> each record in the unit order database having a reference to the record of
> the corresponding order in the existing order database.

Claims 20-35 recite:

> each record in the unit order database having a reference to a
> corresponding order in the existing order database.

As described above, the Examiner apparently believes that Hsuan's order database corresponds to Applicant's order database and that Hsuan's article database corresponds to Applicant's unit order database. However, Hsuan offers not teaching or suggestion that each record in its article database has a reference to a corresponding order in its order database. While records in each of Hsuan's databases may contain one or more of the same items of information, such as article ID (*see, e.g.,* Figs. 10 and 11), Applicant can find no teaching or suggestion that each record in Hsuan's article database has a reference to a corresponding order in Hsuan's order database.

Claims 1-19, 21-31, and 36 also recite "setting a status in the record of the unit order database for the unit of the item of the order to reflect the changed order status." Claims 1-10 and 22-31 recite:

when order status of a unit of an item of an order changes, setting a status in the record of the unit order database for the unit of the item of the order to reflect the changed order status.

Claims 11-19 and 21 recite:

means for setting a status in a record of the unit order database for a unit of the item of the order to reflect a changed order status when order status of the unit of the item of the order changes.

Claim 36 recites:

responsive to determining the change in order status of the unit of the item of the order, setting a status indicator in the record of the unit order database for the unit of the item of the order to reflect the changed order status.

For example, order status of a unit may change to indicate that a unit has shipped. Accordingly, a status may be set in the record of the unit order database for the unit to indicate a ship date of the unit. The Examiner points to Figs. 11 and 12 of Hsuan, with their corresponding descriptions, as describing this recited feature. The Examiner indicated that a change in Hsuan's order database may include tracking. (Office Action, Jan. 29, 2007, p. 4.) In the portions of Hsuan cited by the Examiner, Hsuan describes that a customer may track an order, such as by clicking a "track an order" button. In response to such a request, Hsuan's tracking system uses a customer ID associated with the customer to search its article database and/or its order database. Hsuan's tracking system may return information to the customer, such as the process status of the order. However, unlike Applicant's techniques, Hsuan's tracking is not a status <u>change</u>; instead, it is a request that the status be reported to the customer. Further, Applicant can find no teaching or suggestion in Hsuan that a "status in a record of the [article] database for a unit of the item of the order to reflect a changed order status when the order status of the unit of the item of the order changes."
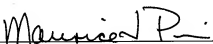
Accordingly, the claims are patentable over Hsuan.

Conclusion

In view of the foregoing, the pending claims comply with the requirements of 35 U.S.C. § 112 and are patentable over the applied art. The Applicant accordingly requests reconsideration of the application and a Notice of Allowance. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to contact the undersigned at (206) 359-8548.

Respectfully submitted,

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